STATE OF MAINE
PUBLIC UTILTIIES COMMISSION

Docket No. 99-717

December 20, 1999

PUBLIC UTILITES COMMISSION
Anti-Cramming Rule: Registration and Customer Authorization Requirements, Complaint Procedures, and Penalty Provisions for Billing Agents, Service Providers, and Billing Aggregators

ORDER ADOPTING RULE

WELCH, Chairman; NUGENT AND DIAMOND, Commissioners

I. INTRODUCTION

In this Order, we adopt a final rule that prohibits service providers from placing a charge for a good or service on a customer's telephone bill without first obtaining the customer's express authorization. This practice is commonly referred to as "cramming." The rule requires that billing aggregators and service providers be registered with the Commission prior to placing charges for goods or services on a customer's telephone bill, and prescribes a process for such registration. The rule also establishes a process for resolving customer complaints associated with cramming and prescribes penalties for violations of the rule.

II. BACKGROUND

The nature and variety of goods and services charged on customer telephone bills have changed dramatically over the past few years. Along with these changes, customers have become increasingly confused about the charges on their telephone bills. Unscrupulous companies can take advantage of this confusion by adding unauthorized charges to a customer's bill, i.e. cramming. Due to the complexity of the bill, it is often difficult for customers to notice a new charge that may have been crammed onto their phone bills.

The Legislature enacted Title 35-A, section 7107 to enable the Commission to protect telecommunications customers from the misleading and abusive marketing practices associated with cramming. Section 7107 establishes a registration system for entities that place charges on customers' telephone bills. These registered entities are required to obtain explicit customer authorization for all charges that will appear on the customer's telephone bill. If the registered entities or the billing agents fail to comply with requirements of the rule, the Commission is authorized to impose administrative penalties of up to $1,000 per violation and to revoke the registration of the service provider or billing aggregator.

Section 7107 requires the Commission to adopt rules to implement the statutory requirements and also specifically requires the Commission to:

1. Establish clear standards for interpreting and applying the state-of-mind standard applicable to billing agents who bill on behalf of service providers that are not properly registered with the Commission;

2. Define types of evidence that constitute sufficient evidence of customer authorization in a manner that imposes the least economic and technical burdens on customers and service providers; and

3. With regard to direct-dialed telecommunications services, provide that evidence that a call was dialed from the number that is the subject of the charge is sufficient evidence of authorization for the charge for that call.

On October 19, 1999, we issued a "Notice of Rulemaking and Proposed Rule" (NOR) seeking comments from interested parties on the proposed rule. A public hearing was held on November 16, 1999, and oral and written comments were accepted until November 29, 1999. The Commission received oral and written comments from the following interested parties: AT&T, Bell Atlantic (BA), the Coalition to Ensure Responsible Billing (CERB), the Office of the Public Advocate (OPA), Sprint, the Telephone Association of Maine (TAM), and the Telecommunications Resellers Association (TRA).

Pursuant to section 7101(6), rules adopted under this section are routine technical rules, as defined in Title 5, chapter 375, subchapter II-A.

III. DISCUSSION OF INDIVIDUAL SECTIONS

In this section of the Order, we discuss the individual sections of the final rule, the positions of commenters, and our rationale for maintaining or modifying the provisions of the proposed rule.

Section 1: General Provisions and Definitions

Section 1(A) states the general scope of the rule. The proposed rule applied to local exchange carriers and resellers of local exchange service in Maine, as well as service providers and billing aggregators who bill for goods or service by placing a charge on customers' telephone bills.

Bell Atlantic commented that section 7107 applies to all "telephone utilities," including interexchange carriers. BA also stated that many interexchange carriers bill customers in Maine directly, and therefore, would be considered a "billing agent" under the statute and should be subject to the Commission's anti-cramming rules.

We agree with BA's position and have amended the scope of the rule to apply to "all telephone utilities," as defined in 35-A M.R.S.A. §102(19).

Section 1(B) contains definitions of terms used in the rule. The definitions are generally self-explanatory, with the exception of “customer,” "service provider," and “unauthorized charge.”

The proposed rule defined “customer” as any person who has agreed to receive, been accepted, and is receiving telecommunications service or has agreed to be billed for the same, including that person’s spouse or legal guardian. For businesses, "customer" also included a person designated as the contact person for telecommunications services or any other person with actual authority to purchase goods or services on behalf of the organization.

AT&T and CERB commented that the definition of "customer" in the proposed rule was too restrictive, particularly in the residential context, because it did not reflect the fact that people other than those specified in the rule may have the authority to authorize a change in service. We disagree with this position with respect to the residential portion of the definition. We believe that authorizations for charges for residential customers should be limited to the individuals described in the proposed rule because these are the individuals whose names appear on the account and/or who have the authority to make decisions regarding the telephone account subject to the billing charges. Accordingly, the final rule mirrors the proposed rule and has not been changed in response to the parties’ comments.

We do agree, however, that for businesses, there may be individuals other than those listed in the proposed rule with authority to authorize the purchase of a good or service. We have added the term “apparent authority” to our definition of business customer in order to reflect the principles of the law of agency, which generally apply to transactions with businesses.

The proposed rule defined a "service provider" as any person, other than the billing agent, who offers a product or service to a customer, the charge for which will appear on the bill of a billing agent, including interexchange carriers. BA commented that the inclusion of "interexchange carriers" in the definition is contrary to the intent of the statute. BA stated that the Legislature expressly exempted telephone utilities from any registration requirements or customer authorizations. We agree with BA's comment and have removed the term "interexchange carrier" from the definition. The rationale for this decision is discussed further in Section C.

The final rule defines an “unauthorized charge” as a charge for a service or product by a service provider who has not obtained or verified customer authorization as required in section 2 of this rule. An unauthorized charge also includes all charges generated or billed by service providers and billing aggregators who are not registered with the Commission. For the purposes of the rule, a charge for a collect call will be deemed authorized by the person receiving the call at the dialed location. With respect to direct-dialed calls for which the call itself represents the service rendered, e.g. 900 calls and "dial around" calls, evidence that the call was placed from the number that is subject to the phone bill shall be considered sufficient evidence of authorization for the call. This definition is discussed further in Section B.

B. <u>Section 2: Charges for Goods and Services Appearing on a Customer's Telephone Bill</u>

Section 2(A) of the proposed rule prohibited service providers from billing a customer for goods or services that will appear as a charge on the customer's local telephone bill without first obtaining the customer's express authorization, even if the customer initiates the call to the service provider. AT&T commented that customer authorization should only be required for situations involving company solicitations, and not for situations where the customer initiates the transaction. We disagree with AT&T's position and have not made the suggested changes. The final rule reflects our belief that customer authorization is necessary to prevent cramming in those instances where an unauthorized charge is placed on a customer's bill and the cramming party claims that the customer requested the good or service over the phone.

Title 35-A section 7107(6) requires the Commission to define the types of evidence that constitute "sufficient evidence" of customer authorization in a manner that imposes the least economic and technical burdens on the customers and service providers. Section 2(B) of the proposed rule required service providers billing a customer for goods or services that will appear as charges on the customer's local telephone bill to verify the customer's authorization through a letter of agency or with a third party for oral authorization. The Coalition to Ensure Responsible Billing (CERB) commented that voice recordings of sales authorization should be included as a valid authorization method. We disagree. We believe it is important for a neutral third party to verify that the customer understands that he is authorizing the purchase of a good or service, the charge for which will appear on his telephone bill. It is critical that the customer receive unbiased confirmation from a neutral third party to ensure that the customer is fully aware of that to which he or she is agreeing. Accordingly, we will not change the proposed rule with regard to the verification methods for authorization. These verification methods are consistent with those contained in the Commission's slamming rule (Chapter 296) for carriers initiating a preferred carrier change, and thus, both customers and carriers are familiar with these verification methods (or, in any case, will not have to learn two different methods). Therefore, we believe these methods will impose minimal economic and technical burdens on customers and carriers.

Bell Atlantic commented that in situations in which it enters into contracts for services with customers which contain all of the language prescribed in section 2(B)(1) as well additional language, i.e. a contract for the sale of space in phone directories, these contracts should be acceptable as customer authorization pursuant to section 2(A). We agree and have modified section 2(B)(1)(a)(i) by removing the term "only" to allow for the prescribed language of the LOA to be used in addition to other language that may be included in a customer-specific contract for a good or service.

Section 2(C) addresses direct-dialed calls where the call itself represents the service for which a charge is placed on the customer's local telephone bill. The proposed rule provided that such calls would not require additional authorization and specifically listed 900 number services as an example. Bell Atlantic and Sprint commented that the proposed rule should be amended to make clear that all direct-dialed calls, not just calls to 900 numbers, should be exempt from the rule. We agree with these comments and have amended the rule by using the term "direct-dialed calls" and listing several other examples of direct-dialed calls.

C. Section 3: Registration Requirements

Sections 3(A) and 3(B) require service providers and billing aggregators who wish to bill customers for goods or services by placing a charge on a customer's local telephone bill to register with the Commission.

Section 3(C) of the proposed rule prohibited billing agents from "knowingly" billing a customer on behalf of a service provider or billing aggregator who is not registered with the Commission. CERB commented that billing agents should not have to verify that a "billing aggregator" is registered with the Commission. We disagree. The statute requires that both "service providers" and "billing aggregators" be registered with the Commission. 35-A M.R.S.A. §7107. If we followed CERB's recommendation, there would be no need to require that billing aggregators be registered with the Commission. Because the statute requires billing aggregators to be registered, we believe that requiring billing agents to verify that billing aggregators are registered with the Commission is consistent with the intent of the statute and therefore have not made the change proposed by CERB.

Section 3(C)(1) of the proposed rule defined "knowingly" as billing on behalf of a service provider or billing aggregator whose name does not appear on the Commission's list of registered service providers and/or billing aggregators at the time the charge appeared on the customer's local phone bill. TAM commented that the proposed rule does not conform to the statute because the rule's definition is vague, confusing, and relies on technology that is not 100% reliable. Bell Atlantic also expressed concerns with the proposed rule's definition of "knowingly."

We do not necessarily agree with TAM that the proposed rule is confusing; however, we do agree that the proposed rule may be inconsistent with the statute. Specifically, we do not believe that it is appropriate to create a strict liability standard. The term "knowingly" as commonly used in statutes and rules requires some level of subjective, conscious intent to take an action.[1] To make this standard administratively enforceable, we have modified the proposed rule by creating a rebuttable presumption

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[1]Black's Law Dictionary defines knowingly as: "With knowledge; consciously; intelligently; willfully; intentionally." Black's Law Dictionary, 784 (5th ed.).

that a billing agent that bills on behalf of a service provider or billing aggregator that is not on the Commission's list of registrants has done so knowingly.

Section 3(C)(1)(b) was added to the rule to require the Commission to remove registrants from the Commission's list within two days of the revocation of their registration pursuant to section 4(G).

Section 3(C)(1)(c) requires a billing agent who places a charge on a customer's bill on behalf of a service provider and/or billing aggregator who is not registered with the Commission to immediately remove said charge from the customer's bill and holds that agent liable to the customer for reimbursement of charges paid. Section 4 of the rule prescribes the process for such reimbursement.

Section 3(D) of the proposed rule required bills issued by billing agents to comply with the Federal Communications Commission's "Truth-in-Billing Rule."[2] This rule requires that customers' bills be organized clearly, highlighting new charges or changes in service, fully describe all charges, identify service providers, and clearly and prominently disclose sufficient information so that customers can inquire about charges on their bills. AT&T commented that the Commission should not require compliance with FCC rules prior to the time those rules become effective.[3] We agree with AT&T and have modified section 3(D) to require compliance with the "Truth-In-Billing" once the rule becomes effective.

TAM commented that the Commission should explicitly set forth the requirements for bill format without reference to any FCC proceeding or rule. We disagree. We believe that requiring compliance with a soon-to-be existing rule, with which carriers will be required to comply, minimizes any burden placed on the carriers. If we were to establish our own requirements, in addition to the FCC's rule, an additional layer of regulations would be added without significant benefit to the consumer. Finally, requiring bills issued by billing agents to comply with the FCC's "Truth-in-Billing Rule" will significantly reduce or eliminate customer confusion regarding telephone bills and should provide customers the means not only to detect, but also to resolve, instances of cramming.

Section 3(E) of the proposed rule provided that a telephone utility that is authorized by the Commission to provide telephone service in Maine was not required to be registered with the Commission, but it did require that any telephone utility acting as a service provider (as defined in Section 1(B)(3)) comply with Sections 2 and 5 for customer authorization and resolving customer complaints. All affiliates or subsidiaries of certified telephone utilities that offer services other than telecommunications services were also required to register with the Commission and abide by the rule. The purpose

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[2] In the Matter of Truth-in-Billing and Billing Format, First Report and Order and Further Notice of Proposed Rulemaking, Docket No. 98-170 (F.C.C. April 15, 1999).

[3] The "Truth-In-Billing" rule is scheduled to become effective on April 1, 2000.

of this language was to prevent instances of cramming by affiliates and subsidiaries of the billing agent and to hold all service providers to the same regulatory standards.

Bell Atlantic commented that the provision requiring a telephone utility acting as a service provider to comply with Sections 2 and 5 directly conflicts with the legislative directive that expressly exempts telephone utilities from the definition of "service provider." Section 7107 states that "service providers who are telephone utilities and who are not required to register with the Commission under section 2 are subject to the jurisdiction and control of the Commission as otherwise provided under this Title." While we believe the goal of holding all service providers to the same standards is a proper one, we agree with BA that the Legislature intended to exclude telephone utilities from complying with the customer authorization requirements of the statute. We therefore modify Section 3(E) of the proposed rule to exempt telephone utilities from being considered as "service providers." We reiterate, however, that to the extent a subsidiary or affiliate of a utility is not a telephone utility under 35-A M.R.S.A. §102, that entity must comply with all applicable requirements of this rule.

D. <u>Section 4: Registration Procedures for Service Providers and Billing Aggregators</u>

Section 4 of the rule sets forth the procedures for registering service providers and billing aggregators with the Commission, for reviewing and/or rejecting applications, and for revoking registrations.

Section 4(A) describes the registration procedure. CERB commented generally that the registration requirements were too vague and needed to be clarified. CERB also stated that the registration form specified in Section 4(A)(1) should require only "rudimentary" information. We agree with CERB that the form should only contain basic information and have created a simple form that requires a minimal amount of information. We have included the actual form as an attachment to the rule.

Section 4(A)(3) of the proposed rule required that applicants advise the Commission of any material changes in the information provided to the Commission during the pendancy of the application. CERB commented that the term "material" was too vague and that the Commission needed to define it. Because we have limited the information required in the application to the bare essentials, any change in information will be important and require updating. Accordingly, we have deleted the term "material" from Section 4(A)(3), and applicants will be required to inform the Commission of any changes in information provided on the application.

Section 4(A)(4) requires that the Commission will serve notice of all approved applications on the Commission's Internet website within two (2) business days of the registration becoming effective. This will ensure that the Commission's registration list is updated in a timely manner.

Section 4(B) states that the Commission will register an applicant unless the registration form is incomplete or the Commission finds that the applicant knowingly misrepresented or omitted a material fact on the application or that the applicant or a principal of the applicant has engaged in conduct that would constitute grounds to revoke a registration under the rule. This eliminates a potential anomaly by allowing the Commission to deny an application if grounds exist that would warrant a revocation if the applicant were already registered. CERB commented that the rule should provide specific standards for review of applications. We believe that the standards adopted in this section are sufficiently specific and enforceable.

Section 4(C) requires that the Director of the Consumer Assistance Division (Director or CAD Director) review all applications and then describes the actions that should be taken with regard to each possible type of application. First, under section 4(C)(1), if the application is complete and there is no indication of conduct that would constitute grounds to deny a registration, the registration will take effect 14 days after the filing date. Second, if the application is incomplete, the CAD Director may request additional information from applicants. If, after submission of additional information, the CAD Director is satisfied that the application meets the Commission's registration criteria, the CAD Director will approve the registration. Finally, if an application is complete but there is evidence of conduct that would constitute grounds to deny a registration, the CAD Director will object to the application and provide notice to the applicant within 14 days. Once the CAD Director objects to an application, the registration will not become effective unless expressly approved by the Commission. Any applicant whose registration has been objected to will be afforded an opportunity for a hearing by the Commission at which the applicant may present other evidence in support of its application.

Section 4(D) sets forth both the process and standards for Commission revocation of a registration. To revoke a registration, the Commission must initiate an adjudicatory proceeding and provide the registrant with an opportunity to be heard regarding the specific incidents which are the subject of the Commission's revocation proceeding.

Section 4(G)(1) of the proposed rule stated that the Commission may revoke a service provider's registration if the service provider has knowingly or repeatedly billed one or more customers for unauthorized service, engaged in other false or deceptive billing practices prohibited by other Commission rules, or has operated in a manner contrary to the public interest. CERB commented that subsections G(1)(c) and G(2)(c), the public interest provisions, should be eliminated because they did not prohibit specific actions. We agree with CERB's comment and have eliminated these subsections.

Finally, we also modified section 4(G)(2)(a)(i) of the proposed rule to make it consistent with the definition of knowingly adopted in section 3. Specifically, we created a rebuttable presumption that a billing aggregator who forwards a charge for a service provider who is not on the Commission's list does so knowingly.

Section 4(G)(4) of the proposed rule required the Commission to notify only telephone utilities of registration revocations. TAM and CERB both commented that billing agents, as well as billing aggregators, should receive notice when a registration is revoked. We have modified the proposed rule to require the Commission to provide written notice of the revocation of a registration to telephone utilities and billing aggregators doing business in Maine within two (2) business days of the revocation becoming final.

E. Section 5: Complaint Procedures

Section 5 of the rule sets forth the procedures used for resolving customers' complaints that unauthorized charges have been included on their telephone bills. Section 5(A) provides that, upon notice from a customer that an unauthorized charge has been included in the customer's telephone bill, the billing agent must immediately suspend collection efforts for that charge. This allows the billing agent time to investigate the claim without requiring the customer to pay the questionable charges. Section 5(A)(1)(b) then requires the billing agent either to cease collection efforts entirely with regard to the disputed charge or to request evidence from the service provider that the customer authorized the service for which payment is sought. We do not require the billing agent to investigate every complaint because there may be circumstances where it is more cost-effective for the billing agent to cease collections rather than incur the costs of investigation.

Section 5(A)(1) provides that if the billing agent ceases collection efforts or if sufficient evidence of customer authorization is not presented to the billing agent within 30 days of a request for such information by the billing agent, the billing agent must immediately remove any charges associated with the unauthorized service. In addition, the billing agent must refund to the customer any amounts paid for the unauthorized service that were billed by the billing agent during the six months prior to the customer's complaint or during any longer period for which the customer can prove the customer was billed by the billing agent for unauthorized services. Section 5(A)(2)(b) provides that such proof includes, but is not limited to, possession of past bills issued by the billing agent that contain the unauthorized charges.

Sprint recommended that the reimbursement period available to the customer be reduced to 30 days, to be commensurate with the FCC's "refund period."[4] We disagree. Section 7107 specifically allows for the reimbursement of any amounts paid for the unauthorized service during the six months prior to the customer's complaint or during any longer period if the customer can prove the customer was billed for an unauthorized service by the billing agent. Reducing the reimbursement period available to customers to 30 days would be inconsistent with the section 7107.

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[4] We presume that Sprint is referring to the refund period contained in the FCC's Slamming Rule.

Section 5(B) provides that if the service provider is able to present sufficient evidence of customer authorization to the billing agent (as provided by Section 2 of this Rule), the billing agent may restore the charges on the customer's bill and reinstitute collection efforts. TRA commented that the Commission, rather than the billing agent, should assume the enforcement role with regards to determining whether sufficient evidence of customer authorization exists. We disagree. Section 5(A)(1) requires a billing agent to immediately suspend collection efforts and either cease collection efforts entirely or request evidence from the service provider that the customer authorized the service for which payment is sought. This provides the billing agent decision-making authority as to whether to pursue the collection of funds from the customer or not. Presumably, if the billing agent requests evidence of customer authorization, it intends to pursue collection, which will directly benefit the service provider so long as there is sufficient evidence of customer authorization. In addition, the service provider has the right to appeal the billing agent's determination to the CAD pursuant to section 5(D).

We added a subsection 5(C) to the rule at the recommendation of the OPA, who suggested that billing agents be required to provide notice to the customer whenever charges are restored to the customer's bill. The notice shall include information that notifies the customer of the decision by the billing agent to restore charges to the customer's bill and the right to file an appeal of the billing agent's determination with the Consumer Assistance Division. It shall also provide the CAD's toll free consumer line, mailing address, and e-mail address. We agree with the OPA that it is important for customers to be aware of a decision that adversely affects them, as well as their right to appeal such a decision.

Under Section 5(D) of the proposed rule, both the customer and the service provider have the right to appeal the billing agent's determination regarding the sufficiency of the customer's authorization to the Commission's Consumer Assistance Division. The proposed rule provided that all such appeals would be handled as complaints to the Consumer Assistance Division. TAM commented that the appeals should not be counted as "complaints" against the billing agent. We agree and have modified section 5(C) to explicitly state that appeals will not be counted as complaints against the billing agent.

F. Section 6: Penalty

Section 6 sets forth the process used when the Commission determines that the imposition of an administrative penalty against violators of the rule is necessary. The rule requires the Commission to institute an adjudicatory proceeding and provide the alleged violator with an opportunity to be heard regarding the imposition and amount of the penalty.

Section 6(A) states that penalties may be imposed upon service providers who forward charges for unauthorized services, service providers or billing aggregators who forward charges to billing agents without first registering with the Commission, and billing agents who knowingly bill on behalf of service providers or billing aggregators who are not properly registered with the Commission at the time the billing agent's bill is generated.

Section 6(B) requires that the CAD Director provide the Commission with a description of the violation and its severity and recommend a penalty based upon the criteria listed in section 6(C).

Section 6(C) allows for the imposition of an administrative penalty of up to $1,000 per violator for violations arising out of the same incident or complaint. Section 6(C) also clarifies that in certain situations where more than one entity is involved in a violation, e.g. a service provider and a billing aggregator, each entity in violation of the rule will be liable for a penalty up to $1,000 per violation. In addition, Section 6(C) states that in situations where a service provider, billing aggregator, or billing agent is notified by a customer that an unauthorized charge was placed on the customer's bill and the provider, aggregator, or agent either fails to remove the charge or reinstitutes the charge to the customer's bill without customer authorization, each time the unauthorized charge reappears on the customer's bill will be considered a separate violation.

Bell Atlantic recommended that the Commission make clear that "authorization from the customer" in section 6(C) refers to the customer's prior authorization of the good or service and not the customer's authorization to reinstitute a previously contested charge if sufficient evidence of its authenticity is presented to the billing agent. To clarify this, BA recommended that we include the phrase "sufficient evidence of" between the words "without" and "authorization." We agree with BA and modify the rule as recommended.

Section 6(C) provides that the amount of the penalty assessed will be based on the severity of the violation, including the intent of the violator, the nature, circumstances, extent and gravity of any prohibited acts, the history of previous violations, and the amount necessary to deter future violations.

Section 6(D) allows the Commission to order the service provider or the billing aggregator to take corrective action if the Commission finds that a service provider or billing aggregator has repeatedly violated the rule. In addition, the Commission, if consistent with the public interest, may suspend, restrict or revoke the registration of the service provider or billing aggregator.

G. <u>Section 7: Waiver or Exemption</u>

Section 7 provides a procedure for persons subject to the rule to obtain a waiver of the requirements of the rule not required by statute. In addition to the Commission, the Director of Technical Analysis, the Director of Consumer Assistance, or the presiding officer assigned to a proceeding related to the rule may grant the waiver.

The OPA requested that the waiver provision require that requests for waivers be provided to the Public Advocate at the same time they are filed with the Commission. 35-A M.R.S.A. §1708 requires public utilities to send copies of all filings submitted to the Commission to the Public Advocate. In addition, the Commission's Administrative Director sends the Public Advocate a summary sheet describing each filing made with the Commission, on the day the case is docketed. It is unclear why the Public Advocate requests specific notice of waiver requests as opposed to any number of other filings required by our rules. We decline to change the rule, but note that utilities requesting waivers should send copies to the OPA as required by law.

Accordingly, we

ORDER

1. That the attached Chapter 297, "Anti-Cramming Rule: Registration and Customer Authorization Requirements, Complaint Procedures, and Penalty Provisions for Billing Agents, Service Providers, and Billing Aggregators," is hereby adopted;

2. The Administrative Director shall send copies of this Order and the attached rule to:

   a. All telephone utilities certified to operate in the State of Maine;

   b. All persons who have filed with the Commission within the past year a written request for copies of this or any other Notices of Rulemaking;

   c. The Office of the Public Advocate;

   d. The Secretary of State for publication in accordance with 5 M.R.S.A. § 8053(5);

   e. The Executive Director of the Legislative Council, State House Station 115, Augusta, Maine 04333 (20 copies); and

   f. The Coalition to Ensure Responsible Billing.

3. That the Public Information Coordinator shall post a copy of this Order on the Commission's World Wide Web page http:\\www.state.me.us/mpuc/).

Dated at Augusta, Maine this 20th day of December, 1999.

BY ORDER OF THE COMMISSION

Dennis L. Keschl
Administrative Director

COMMISSIONERS VOTING FOR: Welch
Nugent
Diamond